REMARKS

The Office Action dated June 27, 2005 has been received and carefully noted. The above amendments to the claims, and the following remarks, are submitted as a full and complete response thereto.

Claims 1, 19, 20, 21, 22, and 23 have been amended, and new claim 24 has been added. However, no new matter has been introduced into the application, and claims 1, 2, and 6-24 are submitted for consideration.

As a preliminary matter, Applicants note that three (3) replacement drawing sheets are attached to this response. Replacement sheet 1/3 has the H.323 terminal 5 added thereto. Applicants submit that this addition to the drawing does not introduce new matter, as the H.323 terminal 5 is described in the specification at page 9, second paragraph. Replacement sheet 2/3 and 3/3 have corrected a typographical error, *i.e.*, element 41 has been changed to 141 to be consistent with the specification. Applicants submit that no new matter has been added to the application and respectfully request entry and consideration of the replacement drawing sheets.

Claims 1, and 19-23 stand rejected under 35 U.S.C. § 102(e) as being anticipated by *Gentry* (US Patent No. 6,888,803). The Office Action took the position that *Gentry* teaches each and every element recited in claims 1, and 19-23. Applicants traverse the rejection and respectfully submit that claims 1 and 19-23 recite subject matter that is neither taught nor disclosed by *Gentry*.

Applicants' claim 1 recites a communications system comprising a subsystem connected to a network, the network having a first part and a second part, the first and second parts being connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts. At least the first user is able to move within the respective part of the system. The subsystem further comprising a gateway for permitting communications between the first and second parts, the gateway comprising a register for storing information associating the the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user. The first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element. Information relating to the the identity of the network element is stored in the register as the current location information of the first user and an identifier allocated in the network element, which is arranged to receive communications intended for the first user is stored in the register.

Applicants' claim 19 recites a gateway for use in a communications system comprising a subsystem connected to a network, the network comprising a first part and a second part, the first and second parts being connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts, wherein at least the first user is able to move within the respective part of the system. The gateway being arranged in use between the first and second parts, the gateway comprising a register for storing information associating the first and second

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users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, wherein the first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element and information relating to the the identity of the network element is stored in the register as the current location information of the first user and an identifier allocated in the network, element which is arranged to receive communications intended for the first user is stored in the register.

Applicants' claim 20 recites a communication system comprising a subsystem connected to a network, the network comprising a first part and a second part, the first and second parts being connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts. The subsystem further comprises a gateway element between the first and second parts, the gateway comprising a register for storing information associating the first and second users, wherein the gateway is arranged to check the source and destination of all information sent between the first and second users in the first and second parts and to permit the information to be passed through the gateway if the source and destination information matches the information stored in the register. The first user is a mobile terminal which is in communication with a base station which is coupled to a respective network element and information relating to the identity of the network element stored in the register as the current location information of the first user and an identifier allocated

in the network element which is arranged to receive communications intended for the first user is stored in the register.

Applicants' claim 21 recites a communications system comprising a subsystem connected to a network, the network having a first part and a second part, the first and second parts being connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts, wherein at least the first user is able to move within the respective part of the system. The subsystem further comprises a gateway for permitting communications between the first and second parts, the gateway comprising a register for storing information associating the the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, the register storing source and destination ports and addresses, at least one of the source and destination addresses and ports being of the first and second user.

Applicants' claim 22 recites a gateway for use in a communications system comprising a subsystem connected to a network, the network comprising a first part and a second part, the first and second parts being connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts, wherein at least the first user is able to move within the respective part of the system. The gateway being arranged in use between the first and second parts, the gateway comprising a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that

information from the second user can be directed to first user, the register storing source and destination ports and addresses, at least one of the source and destination addresses and ports being of the first and second user.

Applicants' claim 23 recites a communication system comprising a subsystem connected to a network, the network comprising a first part and a second part, the first and second parts being connected so that a first user in one of the first and second parts can communicate with a second user in the other of the first and second parts, the subsystem further comprising a gateway element between the first and second parts. The gateway comprising a register for storing information associating the first and second users, wherein the gateway is arranged to check the source and destination of all information sent between the first and second users in the first and second parts and to permit the information to be passed through the gateway if the source and destination information matches the information stored in the register, the register storing source and destination ports and addresses, at least one of the source and destination ports being of the first and second user.

As discussed below, Applicants submit that the references cited in the Office Action fail to teach or disclose each and every element recited in claims 1 and 19-23.

Gentry teaches a system for providing wire line telephone services to wireless subscribers utilizing a packet data network. The system includes a base station controller and a base station controller gateway for providing client based services to mobile subscribers and for providing protocol mapping between a mobile protocol and a packet

data network protocol. The system of *Gentry* further includes a mobility gatekeeper for managing network mobility services for each wireless call including the establishment of a call control path and a speech path between the base station controller and a serving end office telephone point. The system also includes an end office gateway for providing protocol conversion between the packet data network protocol and the end office point data protocol such that a wireless subscriber has access to all wire line services provided by the end office point. A mobile switching center and mobile switching center gateway are included to facilitate inter-system call handoffs into an existing circuit-switched wireless telephony network.

The "gateway" of *Gentry* is described as a node that serves as a gateway between an existing base station controller and the IP network. The base station controller gateway provides T1 voice and call control ports to the base station controller as well as IP ports to IP network. The base station controller gateway is responsible for providing clients that support interworking between the A-interface signaling protocols from base station controller and the IP network protocol, for communicating with a mobility gatekeeper for zone management purposes including, for implementing speech vocoding algorithms into IP network and potentially maintains visitor location register information for mobiles serves by base station controller, and establishing media channels between the base station controller and the IP network.

However, the gateway of *Gentry* is not taught or described as including a "register for storing information associating the the first and second users and for storing

information relating to the current location of the first user so that information from the second user can be directed to first user," as recited in Applicants' independent claim 1. Further, *Gentry* does not teach or disclose that a first user is a "mobile terminal which is in communication with a base station" that is coupled to a network element, where information relating to the identity of the network element is stored in the register as the current location information of the first user and an identifier allocated in the network element. As such, Applicants submit that *Gentry* fails to teach or disclose each and every element recited in Applicants' independent claim 1. Thus, reconsideration and withdrawal of the rejection of independent claim 1 is respectfully requested.

The Office Action cited to column 5, lines 65-67, column 6, lines 1-20, and the discussion of Figure 2 as teaching the recited features and limitations of Applicants' gateway. However, upon careful review of the cited sections of *Gentry*, Applicants find no support for the Office Action's conclusion. Applicants submit that *Gentry* fails to teach or disclose a gateway having a register that stores the identity of the network element, where the network element is couples to the base station that is in communication with the mobile terminal, *i.e.*, *Gentry* does not discuss that a register is used to store an identifier allocated in the network element that is arranged to receive communication intended for the first user. As such, reconsideration and withdrawal of the rejection of claim 1 is respectfully requested.

With regard to the rejection of claim 19, Applicants submit that claim 19 recites subject matter that is not taught or disclosed by *Gentry*. More particularly, as discussed

above with respect to claim 1, *Gentry* fails to teach or disclose that the gateway comprises "a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user," as recited in claim 19. As such, Applicants submit that claim 19 recites subject matter this is not taught or disclosed by *Gentry*. Thus, reconsideration and withdrawal of the rejection of claim 19 is respectfully requested.

With regard to the rejection of claim 20, Applicants submit that claim 20 recites subject matter that is not taught or disclosed by *Gentry*. More particularly, as discussed above with respect to claim 1, *Gentry* fails to teach or disclose "a gateway element between the first and second parts, the gateway comprising a register for storing information associating the first and second users, wherein the gateway is arranged to check the source and destination of all information sent between the first and second users in the first and second parts and to permit the information to be passed through the gateway if the source and destination information matches the information stored in the register," as recited in claim 20. As such, Applicants submit that claim 20 recites subject matter this is not taught or disclosed by *Gentry*. Thus, reconsideration and withdrawal of the rejection of claim 20 is respectfully requested.

With regard to the rejection of claim 21, Applicants submit that claim 21 recites subject matter that is not taught or disclosed by *Gentry*. More particularly, as discussed above with respect to claim 1, *Gentry* fails to teach or disclose "a gateway for permitting

communications between the first and second parts, the gateway comprising a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, the register storing source and destination ports and addresses, at least one of the source and destination addresses and ports being of the first and second user," as recited in claim 21. As such, Applicants submit that claim 21 recites subject matter this is not taught or disclosed by *Gentry*. Thus, reconsideration and withdrawal of the rejection of claim 21 is respectfully requested.

With regard to the rejection of claim 22, Applicants submit that claim 22 recites subject matter that is not taught or disclosed by *Gentry*. More particularly, as discussed above with respect to claim 1, *Gentry* fails to teach or disclose a "gateway being arranged in use between the first and second parts, the gateway comprising a register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user, the register storing source and destination ports and addresses, at least one of the source and destination addresses and ports being of the first and second user," as recited in claim 22. As such, Applicants submit that claim 22 recites subject matter this is not taught or disclosed by *Gentry*. Thus, reconsideration and withdrawal of the rejection of claim 22 is respectfully requested.

With regard to the rejection of claim 23, Applicants submit that claim 23 recites subject matter that is not taught or disclosed by *Gentry*. More particularly, as discussed

above with respect to claim 1, *Gentry* fails to teach or disclose a "gateway comprising a register for storing information associating the first and second users, wherein the gateway is arranged to check the source and destination of all information sent between the first and second users in the first and second parts and to permit the information to be passed through the gateway if the source and destination information matches the information stored in the register, the register storing source and destination ports and addresses, at least one of the source and destination ports being of the first and second user," as recited in claim 23. As such, Applicants submit that claim 23 recites subject matter this is not taught or disclosed by *Gentry*. Thus, reconsideration and withdrawal of the rejection of claim 23 is respectfully requested.

Summarizing Applicants arguments with respect to the rejection of claims 1 and 19-23 under §102 over *Gentry*, Applicants submit that *Gentry* does not teach or disclose a gateway having a register, and further, that information such as identity and location information is stored in the register. As such, Applicants submit that *Gentry* does not properly support a §102 rejection of claims 1 and 19-23. Thus, reconsideration of the rejection of claims 1 and 19-23 is respectfully requested.

Claims 12 and 14 stand rejected under 35 U.S.C. §103(a) as being unpatentable over *Gentry* (US Patent No. 6,888,803) in view of *Ramasubramani* (US Patent No. 6,507,589). The Office Action took the position that the cited combination of references teaches each and every limitation recited in claims 12 and 14. More particularly, the Office Action took the position that *Gentry* teaches each and every element recited in

claims 12 and 14, with the exception of the register storing source and destination ports and addresses, and wherein at least on of the source and destination addresses and ports are of an intermediate network element between the gateway and the user. However, the Office Action takes the position that *Ramasubramani* teaches the feature, and as such, the Office Action concludes that the combination of references renders claims 12 and 14 obvious. Applicants traverse the rejection and respectfully submit that claims 12 and 14 recite subject matter that is neither taught, disclosed, nor otherwise suggested by the cited combination of references.

Claim 12 recites a communications system as recited in claim 1 (discussed above), wherein the register stores source and destination ports and addresses.

Claim 14 recites a communications system as claim 12, wherein at least one of the source and destination addresses and ports are of an intermediate network element between the gateway and a user.

As a preliminary matter, Applicants note that each of claims 12 and 14 are dependent upon claim 1, and claim 1 has been explained above as being allowable. As such, Applicants submit that claims 12 and 14 are also allowable as a result of being dependent upon an allowable base claim. Reconsideration and withdrawal of the rejection is therefore respectfully requested.

Gentry is discussed above. *Ramasubramani* teaches a communication system for routing between network gateways and service centers. The communication system of

Ramasubramani includes a multi-network gateway that is able to couple various wireless carrier networks with different network characteristics to the Internet. The gateway is described as including a push agent and a pull agent that are agents or processing modules within the multi-network gateway that serve to provide wireless communication devices with access to information from the Internet. The push agent operates to "push" information content from the Internet to the wireless communication devices. The pull agent operates to "pull" information content from the Internet when requested by the wireless communication devices. The push and pull agent are coupled to the Internet by an HTTP module and to carrier networks by a wireless carrier interface.

However, *Ramasubramani* does not teach that a gateway includes a "register for storing information associating the first and second users and for storing information relating to the current location of the first user so that information from the second user can be directed to first user," as recited in Applicants' independent claim 1, the claim from which claims 12 and 14 depend. Further, *Ramasubramani* does not teach or disclose that a first user is a "mobile terminal which is in communication with a base station" that is coupled to a network element, where information relating to the identity of the network element is stored in the register as the current location information of the first user and an identifier allocated in the network element, which is also recited in claim 1, the independent claim from which claims 12 and 14 depend. As such, Applicants submit that *Ramasubramani* fails to further the teaching of *Gentry* to the level necessary
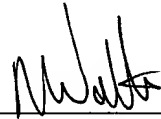
to properly support an obviousness rejection. Thus, reconsideration and withdrawal of the rejection of claims 12 and 14 under §103 is respectfully requested.

In conclusion, Applicants submit that each of claims 1, 2, and 6-23 recite subject matter that is neither taught, shown, nor otherwise suggested by the cited combination of references. Further, new claim 24 has been added and is directed to the subject matter recited in claim 7, which was indicated as allowable in the Office Action. Thus, claims 1, 2, and 6-24 are respectfully submitted for consideration.

If for any reason the Examiner determines that the application is not now in condition for allowance, it is respectfully requested that the Examiner contact, by telephone, the applicant's undersigned attorney at the indicated telephone number to arrange for an interview to expedite the disposition of this application.

In the event this paper is not being timely filed, the applicant respectfully petitions for an appropriate extension of time. Any fees for such an extension together with any additional fees may be charged to Counsel's Deposit Account 50-2222.

Respectfully submitted,

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Enclosures: 3 Replacement Sheets of Formal Drawings
              Petition for Extension of Time
              Amendment Transmittal